

# LAW OFFICE OF H. CANDACE GORMAN

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Jackson Lewis  
150 N. Michigan, Suite 2500  
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Attn: Patrick Rocks

Re: COURT ORDER in re IPRA/Young v. Chicago  
13 C 5651

Dear Patrick,

Thank you for your letter and limited discovery sent yesterday. We are not of course done. As we discussed outside of Court over two weeks ago I want to review the hundreds of emails that your client is now claiming are not responsive to my subpoena. As you know I have been told by IPRA's in house attorney that there were more than 700 emails and I have been told by your co-counsel Elan that there are more than 900. The documents that you tendered yesterday confirms that your own investigation into the documents that should be tendered has been inadequate as those were missed the first time around.

I also disagree with your conclusion that anything generated after January 3, 2014 is outside of the subpoena. The fact that IPRA apparently officially closed its investigation on that date does not mean that no further investigation was being conducted. In fact, IPRA has looked into several investigations after they were "officially" closed and this file was not turned over to me until 2015. I was told that it was not turned over until that time because of an on-going

investigation. The fact that documents were generated after the January 3<sup>rd</sup> date also suggests that the investigation was ongoing. Finally, I understand that the DOJ is looking into the police shooting files including this file, which means that this investigation is not "closed."

As we discussed a few weeks ago I want to come and view the documents. It also appears that you are holding additional documents based on various privileges and I want a complete privilege list. I am also waiting to hear what other documents are in the personal hands of former IPRA employees.

Very Truly Yours,

*H. Candace Gorman*

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